

State Water Resources Control Board

May 12, 2017

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7015 1520 0001 8017 0521

Ms. Natasha Ravare-Evans
Manager of Engineering
City of Oakland
1411 East 31st Street
Oakland, California 94602
nevans@alamedahealthsystem.org

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT HIGHLAND HOSPITAL, 1411 EAST 31ST STREET, OAKLAND**

Dear Ms. Ravare-Evans:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on April 27, 2017, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Plot Plan/Site Plan Onsite – Scale diagrams indicating the location of the USTs, piping, and auxiliary equipment were not available at the time of inspection.	All	April 27, 2017	Ongoing	23 CCR 2711(a)(8)
2	Failure to Maintain Operating Permit Onsite – A copy of the operating permit was not available at the time of inspection.	All	April 27, 2017	Ongoing	H&SC 25284(a) 23 CCR 2712(i)
3	Failure to Provide Designated Operator (DO) Training Records – Current DO training documentation was not present at time of inspection. The document onsite was dated April 19, 2016. DO training must be conducted annually.	All	April 19, 2017	Ongoing	23 CCR 2715(f)

No.	Violation	Tank	Start Date	Stop Date	Regulation
4	Failure to Maintain Evidence of Financial Responsibility – A current Certificate of Financial Responsibility and a letter from the Chief Financial Officer were not present at the time of inspection.	All	July 28, 2015	Ongoing	H&SC 25292.2; 23 CCR 2711(a)(11)
5	Failure to Maintain Secondary Containment – Liquid brine was visible inside the turbine sump. The source of this brine must be determined.	HCP	April 27, 2017	Ongoing	H&SC 25290.1(c)(3)
6	Failure to Maintain Secondary Containment – Water was visible in both the piping transition sump and the venting transition sump at the time of inspection.	HCP	April 27, 2017	Ongoing	H&SC 25290.1(c)(3)
7	Failure to Monitor Product Piping – At the time of inspection, the liquid sensors for the ACT generator sumps and middle ACT boiler sump were not positioned under the product line penetration fittings.	ACT Generator and Boiler	April 27, 2017	Ongoing	23 CCR 2630(d)
8	Failure to Install Line Leak Detectors (LLD) – An LLD was not observed on the ACT boiler tank at the time of inspection.	ACT Boiler	April, 27 2017	Ongoing	H&SC 25290.1(h); 23 CCR 2636(f)(2)
9	Failure to Tag Monitoring Equipment – An annual monitoring certification tag was not observed attached to the annular sensor at the time of inspection.	Boiler Room UST	April, 27 2017	Ongoing	23 CCR 2638(f)
10	Failure to Maintain Spill Containment Requirements – Water was observed inside the spill container which prevents its ability to hold 5 gallons.	Boiler Room UST	April 27, 2017	Ongoing	23 CCR 2635(b)(1)
11	Failure to Maintain UST Monitoring System – The green power bulb for the Veeder-Root monitoring system was not functioning at the time of inspection.	Boiler Room UST	April 27, 2017	Ongoing	H&SC 25290.1(d)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Alameda County Department of Environmental Health of within sixty (60) days from the date of this letter. Have your DO make specific notations in the next monthly DO report indicating the ongoing violations have been corrected. The monthly DO report and any associated photos must be submitted as proof of compliance.

Please send all compliance documentation to the following:

State Water Board

Mr. Douglas McDevitt
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
douglas.mcdevitt@waterboards.ca.gov

Local CUPA

Ms. Aileen Mendoza
Supervising Hazardous Materials Specialist
Alameda County Environmental Health
1131 Harbor Parkway, Suite 240
Alameda, California 94502
aileen.mendoza@acgov.org

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: (via email only)

Ms. Susan Hugo,
CUPA Program Manager
Alameda County Department of
Environmental Health
susan.hugo@acgov.org

Ms. Aileen Mendoza
Supervising Hazardous Materials Specialist
Alameda County Department of
Environmental Health
aileen.mendoza@acgov.org

Mr. Ed Campodonico
Engineering Supervisor
City of Oakland
ecampodonico@alamedahealthsystem.org